

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

In re:

**THE ROMAN CATHOLIC
ARCHBISHOP OF BALTIMORE**

Debtor.

Case No.: 23-16969-MMH

Chapter 11

**MOTION OF THE UNITED STATES TRUSTEE FOR STAY
OF PROCEEDINGS REGARDING CREDITOR MOTION TO BE ADDED TO
CREDITORS' COMMITTEE IN LIGHT OF LAPSE OF APPROPRIATIONS**

David W. Asbach, Acting United States Trustee for Region 5 (the “United States Trustee”), pursuant to 11 U.S.C. § 105 and Rules 9006 and 9013 of the Federal Rules of Bankruptcy Procedure, moves for a stay of all proceedings related to, including the deadline for the United States Trustee to file a response to, the Motion of John F. Curran, to be added to the creditors’ committee (the “Motion”) (*see* Doc. 1411), and as grounds therefor, states as follows:

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation or continuing resolution, Department of Justice attorneys and employees, including the United States Trustee and his staff, are prohibited from working, even on a voluntary basis, except in very limited

circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice, through the United States Trustee, therefore requests a stay of all proceedings related to, including the deadline for responding to, the Motion, until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department, including the United States Trustee Program. The United States Trustee requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations – *i.e.*, each deadline would be extended by the total number of days of the lapse in appropriations.

WHEREFORE, although we greatly regret any disruption caused to the Court and the other litigants, the United States Trustee hereby moves for a stay all proceedings related to, including the deadline for responding to, the Motion, until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Respectfully submitted,

David W. Asbach
Acting United States Trustee for Region 5

Date: October 15, 2025

By: /s/ Hugh M. Bernstein
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Attorney for the United States Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 15th day of October, 2025, a copy of the foregoing Motion was mailed, first class, postage prepaid, to:

John F. Curran
2096 Brookstone Drive
Mt. Juliet, Tennessee 37122.

I HEREBY FURTHER CERTIFY that according to the Court's ECF records, electronic notice of this motion should be provided to the following persons:

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And that further notice is being provided to all required parties by Epiq Corporate Restructuring, LLC

/s/ Hugh M. Bernstein

Hugh M. Bernstein